

February 4, 2014

Mr. John Batorski  
Plant Manager  
Borough of Naugatuck  
229 Church Street  
Naugatuck, CT 06770

Dear Mr. Batorski:

In June 2012, the Department notified Borough of Naugatuck of the U.S. Environmental Protection Agency (EPA) air emissions requirements for sewage sludge incinerators (SSI). As noted in the previous letter, the deadline to submit a Title V permit application for your facility, March 21, 2014, is quickly approaching.

As outlined in the June 2012 letter, EPA published emission guidelines for existing SSI on March 21, 2011 ([76 FR 15371](#)). Rather than adopt a new state regulation to apply the emission guidelines to you and other SSI owners, the Department is waiting for EPA to promulgate a Federal Plan to implement the emission guidelines in Connecticut. EPA has not yet proposed a Federal Plan but is required to issue the final Federal Plan no later than March 21, 2016.

Because the Federal Plan has not been published, there are no applicable requirements for your facility under Section 129 of the Clean Air Act. Nonetheless, there are other state and federal requirements applicable to your facility, and federal regulations require that you submit a Title V permit application. By submitting an application you will be in compliance with the timetable for Connecticut's federally approved Title V program. Furthermore, although the Federal Plan has neither been proposed nor finalized at this time, EPA expects that the Federal Plan requirements will be substantially the same as the emissions standards and other requirements of the emissions guidelines. Therefore, we encourage you to review the emissions guidelines and plan for compliance with those requirements.

You will receive a follow up telephone call from a permit engineer who will be able to answer specific questions about the application process and requirements. If you would like to discuss any aspect of this letter with me, please contact me at 860-424-3468 or [gary.rose@ct.gov](mailto:gary.rose@ct.gov).

Sincerely,

/s/ Gary S. Rose  
Gary S. Rose  
Director, Engineering & Enforcement  
Bureau of Air Management

GSR:jad

cc: Susan Amarello, Supervising Air Pollution Control Engineer  
Kiernan Wholean, Supervising Air Pollution Control Engineer